REMOVAL PROGRAM
AFTER ACTION REPORT
FOR THE
PARSONS PAPER MILL SITE
HOLYOKE, HAMPDEN COUNTY, MASSACHUSETTS
16 NOVEMBER 2009 THROUGH 26 APRIL 2010

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
Five Post Office Square, Suite 100
Boston, Massachusetts 02109

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1.0 INTRODUCTION

The following report, entitled *Removal Program After Action Report for the Parsons Paper Mill Site, Holyoke, Hampden County, Massachusetts, 16 November 2009 through 26 April 2010,* is a chronological summary of the response actions taken by the U.S. Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch (EPRB). The report details the situation as it developed, actions taken, and resources committed.

Site activities included: securing the site to prevent unauthorized access, evaluating the structural integrity of the remaining building portions to determine their stability and potential for collapse, stabilizing the areas that were structurally unsafe to enable contractor personnel to conduct the removal action, conducting the removal and disposal of asbestos and asbestos-containing material (ACM) debris (the process included provisions for on-site decontamination of larger debris, and segregation of asbestos-free debris), conducting additional investigations of drums/containers and removing those that were found to contain hazardous substances, conducting multi-media sampling as needed to support the above activities, and conducting grade and backfill activities as needed to secure the post-excavated areas of the site.

2.0 SITE CONDITIONS AND BACKGROUND

2.1 Site Location and Description

The Parsons Paper Mill Site (the site) is a 4.61-acre site located at 84 Sargeant Street in Holyoke, Hampden County, Massachusetts (MA) (see Appendix A, Figure 1) [1]. The property is listed on Town of Holyoke Tax Assessors Map Number (No.) 018 as Parcel No. 005, Block 01. The geographic coordinates of the approximate center of the property are 42° 11' 53" north latitude and 72° 36' 42" west longitude. The site is located near downtown Holyoke, between the First (border to the northwest) and Second (border to the southeast) Level Canals. It is in a commercial/industrial/residential area and is currently zoned for "General Industry" uses. There are 32 schools, including daycare centers and public/private schools, within a 1-mile radius of the site. The closest daycare center is less than 0.1 miles away, and Holyoke High School is 0.8 miles away. There are also residences located within 500 feet of the property. In addition, the population within a 1-mile radius of the site is 21,876.

The site was first developed in the 1800s and was purchased in 1890 by Parson's Paper Company, which operated it as a paper manufacturing facility until 2005. Parson's Paper Company, Inc., is a subsidiary of National Vulcanized Fiber Company (NVF), which is currently the owner of the site. The site has been inactive since 2005, and NVF and Parsons Paper Company are currently in Chapter 7 Bankruptcy proceedings. As of 2006, there was only one employee on site, which decreased the vandalism up to that point.

2.2 Site History/Previous Actions

From 1987 through 1990, the Massachusetts Department of Environmental Protection (MassDEP) conducted gasoline release investigations, including installation of three groundwater wells and one soil boring around the former 1,000-gallon underground storage tank (UST) located on site.

Groundwater samples were collected from all three wells, and surface soil samples were collected around the UST. Low-level volatile organic compounds (VOCs), such as benzene, toluene, ethylbenzene and xylenes, and chlorinated solvents were detected in the groundwater [3].

In July 1998, a second gasoline release investigation was conducted around the on-site UST. All three groundwater wells were replaced and sampled, and three subsurface soil samples were collected just above the water table level. Low VOC levels were detected in two of the subsurface soil samples. Trace-level gasoline-related VOCs were detected in one groundwater well, and trace levels of chlorinated VOCs were detected in two wells. All concentrations were below established clean-up levels [4].

In January 2001, TRC Environmental Corporation conducted a polychlorinated biphenyls (PCB) investigation of electrical transformers located in a fenced area on site. Surface soil samples were collected from around seven of the 80 transformers staged on site, and one soil sample was collected outside of the fenced area where the transformers were formerly staged. Analytical results indicated there were "elevated levels of PCBs" both inside and outside the fenced area [4].

In December 2001, a letter from Northeast Utilities System stated that soils contaminated with extractable petroleum hydrocarbons and PCBs were excavated under a Limited Removal Action. Approximately 9 tons of soil were removed from around the transformer area and disposed of at an off-site facility [4].

On 11 October 2005, Western Mass Environmental was subcontracted to excavate stained soil located within the on-site "release area" which consisted of black-stained soil with a strong petroleum odor. Approximately 19.17 tons of a gray-black soil was excavated and loaded out. Excavation depths reached 3.5 feet below ground surface (bgs) [4].

In June 2006, a total of 3,735 gallons and 15,490 pounds of oil or hazardous materials (OHM) were removed from the mill building and site by NVF company (owner at the time), as required by MassDEP, and properly disposed of or recycled off site. Additional items removed from the mill included oils in tanks and pistons, propane in cylinders, refrigerants in refrigeration units, mercury in fluorescent light bulbs, PCBs in transformers and light ballasts, and other limited amounts of waste found in drums or 5-gallon buckets.

In June 2008, a fire damaged approximately half the mill. The rubble from the burned and collapsed portion of the mill was estimated to be approximately 5,000 cubic yards, and filled portions of the northern building foundations. This burned rubble contained primarily brick material, with some amounts of other solid wastes, including wood and metal. The rubble from the fire was an asbestos-containing waste according to MassDEP regulations, based on positive asbestos results of the rubble and other materials within the mill, which were comingled with the brick rubble during the fire. Sources of the asbestos present in the mill (before and after the fire) included asphalt shingles, window glazing/caulking, tank and pipe insulation, transite siding, cement/mastics, and floor tiles. Asbestos sampling indicated that these materials contain ACM, with asbestos levels over 1% [5].

In March 2009, MassDEP contacted EPA On-Scene Coordinator (OSC) Athanasios Hatzopoulos and indicated that according to their August 2008 sampling event, the samples collected revealed friable asbestos up to 40%. Moreover, MassDEP provided EPA additional data that confirmed that asbestos exists at the site. The data consisted of samples collected in August 2008, by Tighe & Bond (a consultant to the owner of the site). The samples revealed friable asbestos up to 70% [6].

On 2 September 2009, the EPRB and its contractor Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) conducted a Preliminary Assessment and Site Investigation (PA/SI) at the site. The PA/SI included collecting samples for asbestos analysis. Debris and pipe insulation material that had fallen on the site were collected for asbestos analysis. The structurally unsafe areas around the remaining portions of the building allowed only 10 samples to be collected.

On 7 October 2009, START received the analytical data results from the EPA Office of Environmental Measurement and Evaluation (OEME). Chrysotile asbestos was detected up to 5%, and amosite asbestos was detected up to 12% [7].

The PA/SI was concluded and based on site conditions and preliminary analytical results, a time-critical removal action was recommended in a closure memorandum dated 14 September 2009.

On 24 September 2009, EPA Office of Site Remediation and Restoration (OSRR) Division Director James T. Owens signed the Action Memorandum approving the proposed removal action.

3.0 SUMMARY OF FEDERAL RESPONSE ACTIONS

3.1 Organization of the Response

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) Five Post Office Square, Suite 100 Boston, MA 02109 (617) 918-1284	Athanasios Hatzopoulos	EPA On-Scene Coordinator (OSC) responsible for the initiation, oversight, and completion of all removal activities. The OSC coordinated with State and local officials.
Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) 3 Riverside Drive Andover, MA 01810 (978) 552-2106	Lauren Bolte	START Site Leader that provided the OSC with technical assistance, site documentation, site health and safety monitoring, air monitoring, debris sampling, and draft and final report preparation.
Environmental Restoration, LLC. (ER) Emergency Rapid Response Services (ERRS) 110 Granby Street Bloomfield, CT 06002 (860) 769-7356	Robert Koentop Richard Ramuglia	Response Manager (RM) for the ERRS contractor that performed removal activities. The RM was responsible for oversight and organization of mobilization, demobilization, and waste removal activities.
Massachusetts Department of Environmental Protection 436 Dwight Street, 5th Floor Springfield, MA 01103 (413) 755-2112	John Bourcier	State representative that was responsible for the oversight of removal activities.

3.2 Mobilization and Site Preparation

The site-specific removal health and safety plan (HASP) was reviewed and signed by all personnel before any work commenced. In addition, emergency telephone numbers and directions to the hospital were posted and work zones were delineated. All activities were performed in appropriate personal protective equipment (PPE) in accordance with the HASP. The HASP was prepared by START personnel as a separate document, entitled *Health and Safety Plan for the Parsons Paper Mill Site, Holyoke, Hampden County, Massachusetts* [8]. On 16 November 2009, the mobilization and staging of Emergency Rapid Response Services (ERRS) equipment was initiated.

Site preparation activities conducted by ERRS personnel consisted of clearing and grubbing the exterior of the buildings; making the interior of the buildings a more safe work environment by rebuilding stairs, blocking off large holes in exterior walls, clearing out any debris in the walkways, adding lights, *etc.*; procuring a laboratory for personal air samples; and arranging site security.

3.3 Chronology of Removal Activities

Week of 26 October 2009

On 28 October 2009, EPA, ERRS, and representatives from the MassDEP and the Holyoke Fire Department conducted a site walk to initiate the removal action and discuss upcoming removal activities.

Weeks of 2, 9 and 16 November 2009

Personnel on site:

OSC – EPA	Athanasios (Tom) Hatzopoulos
START – Weston Solutions, Inc. (Weston)	Site Leader (SL) Lauren Bolte
Response Manager – Environmental Restoration (ER)	Robert (Bob) Koentop
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment on site: Starting the week of 16 November

Type	Quantity
Long Reach Excavator	1
CONEX Box	2
Office Trailer	1
Portable Toilet	3
Crew Trailer	1
Generator	3
Dumpster	1

Type	Quantity
Wheeled Skid Steer	1
Man Lift	1
Decontamination Shower Trailer	1
Light Tower	2
Aerial Lift	1

Activities for the week included:

- Mobilizing the ERRS crew and equipment.
- Identifying site security needs, work tasks, and reviewing analytical data to identify wastestreams and disposal options and vendors.
- Reviewing and signing the site health and safety plan (HASP).
- Collecting bulk asbestos and debris samples.
- Clearing and grubbing the site.
- Installing high-visibility fencing to delineate work zones.
- Conducting structural inspections of work areas by a structural engineer.
- Building new access ways into each work building.

On 16 November 2009, manned site security began and continued on site during the non-working hours throughout the duration of the removal action.

On 17 November 2009, OSC Hatzopoulos and ERRS RM Koentop met with representatives from the City of Holyoke's departments of public works, law, fire, building, gas and electric, and the conservation commission, to discuss removal activities.

Under the direction of the OSC, START personnel collected 54 debris samples from the standing buildings and foundation areas of the razed buildings (see Appendix B, Table 1). The samples were collected with the assistance of a long-reach excavator that was able to grab under large debris in the remaining foundations. Each debris sample was a composite of five excavator buckets taken from within a 20-foot by 20-foot area approximately 0 to 4 feet below the large debris surface. These samples were delivered to EPA OEME for asbestos analysis via Polarized Light Microscopy (PLM).

For the duration of the removal action, START photodocumented site activities (see Appendix C, Photodocumentation Log, and Attachment 1).

Week of 23 November 2009

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	Noah Kutsch
Response Manager – ER	Richard (Rick) Ramuglia/ Bob Koentop
Crew – ER (8 personnel)	1 Foreman 2 Operators

	1 Health and Safety Technician 4 Clean-up Technicians

Equipment on site: Additional equipment starting the week of 23 November

Type	Quantity
Tracked Bobcat	1

Activities for the week included:

- Collecting ACM samples in Building No. 3.
- Clearing around and inside the buildings of concern.
- Removing loose roof slate tiles from Building No. 3.
- Installing exterior steps for entry into Building No. 3.
- Building wood supports for the entranceway to Building No. 1.

On 23 November 2009, EPA OSC Hatzopoulos, and EPA Public Affairs personnel met with representatives from the MassDEP and the City of Holyoke's departments of public works, law, fire, building, gas and electric, and the conservation commission, to discuss removal activities.

Under the direction of the OSC, START personnel collected two additional ACM samples from insulation around an oven located on the second floor inside Building No. 3, which were delivered to OEME for asbestos PLM analysis. The area on the north side of Building No. 1 was completely cleared and ready for a gravel ramp to be installed for direct access to the second floor that was necessary for the equipment. To eliminate possible safety hazards, unstable bricks and slate tiles were removed from the roof top of Building No. 3.

A structural engineer hired by ERRS performed exterior and interior inspection and assessment of the buildings. He recommended wooden columns be built for the main entrance of Building No. 1 to help with stabilization.

On 25 November 2009, all personnel demobilized for the Thanksgiving holiday. Security remained on site during the holiday weekend.

Week of 30 November 2009

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia/Bob Koentop
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment removed from site: Week of 30 November

Type	Quantity
Wheeled Skid Steer	1

Activities for the week included:

- Remobilizing ERRS and START crew members.
- Conducting perimeter air sampling.
- Securing and stabilizing areas on the interior and the exterior of the building.
- Removing loose ACM and debris from the floor and asbestos pipe insulation located on the second floor of Building No. 1.
- Double-bagging, sealing, and labeling friable asbestos removed from buildings.
- HEPA-vacuuming areas that were cleared of large, visible pieces of asbestos.
- Placing bags of asbestos into double-lined 30-yd^3 roll-off containers for disposal.

On 1 December 2009, EPA OSC Hatzopoulos, EPA Branch Chief Art Johnson, and EPA Public Affairs personnel met with the City of Holyoke's current and incoming Mayors, as well as representatives from the departments of public works, law, fire, building, gas and electric, and the conservation commission, to discuss removal activities.

All friable ACM removed from the buildings was double-bagged, sealed, and labeled. After large visible pieces of asbestos were removed, the area was high-efficiency particulate air (HEPA)-vacuumed to ensure a complete removal of all friable asbestos. The bags of asbestos were placed in double-lined 30-cubic-yard (yd^3) roll-off containers for disposal. Engineering controls, including misting with water and immediately bagging disturbed asbestos, were in place throughout the removal action to control dust and to retain the asbestos fibers. Air samples were collected to ensure these controls were effective (see Attachment 1).

Week of 7 December 2009

Personnel on site:

OSC – EPA	Tom Hatzopoulos/Brent England
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia/Bob Koentop
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment on site: Additional equipment starting the week of 7 December

Type	Quantity
330C Excavator	1
Roll-Off Container	2

Equipment removed from site: Week of 7 December

Type	Quantity
Long Reach Excavator	1

Activities for the week included:

- Conducting perimeter air sampling.
- Removing asbestos from the second floor of Building No. 1.
- Clearing brush and debris from between Building Nos. 2 and 3.
- Conducting a Health and Safety audit inspection.

On 8 December 2009, the EPA Health and Safety Officer mobilized to the site to conduct a site health and safety inspection. A temporary construction fence was built to delineate elevation drops and unsafe areas on the eastern side of Building No. 4 at the Health and Safety Officer's request.

On 10 December 2009, START received bulk asbestos analytical results from OEME (see Appendix B, Table 2) [9; 10]. Asbestos was detected up to 15% chrysotile in various locations of the footprint of Building No. 4. Asbestos was detected up to 15% amosite and 50% chrysotile in the southern section of Building No. 5.

When clearing the area between Building Nos. 2 and 3, approximately 35 6-inch transite pipes were discovered and collected for disposal in a polyethylene double-lined roll-off container.

Week of 14 December 2009

Personnel on site:

OSC – EPA	Brent England
START – Weston	SL Lauren Bolte
Response Manager – ER	Bob Koentop
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment removed from site: Week of 14 December

Type	Quantity
Manlift	1

Activities for the week included:

- Conducting perimeter air sampling.
- Completing asbestos removal from the second floor of Building No. 1.
- Loading all the asbestos bags from the second floor into a double-lined roll-off container.
- Clearing debris from inside the boiler room.
- Completing asbestos removal from the catwalk in the basement of Building No. 1.

While clearing the boiler room, and for the remainder of removal activities, all non-asbestos-containing debris (wood, metal, and brick) were segregated and stockpiled in pre-designated areas.

On 17 December 2009, EPA held a public meeting with the City of Holyoke to discuss and update the City, local community, MassDEP, and the media, of the EPA's removal activities.

Week of 21 December 2009

Personnel on site:

OSC – EPA	Brent England
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment removed from site: Week of 21 December

Type	Quantity
Aerial Lift	1

Activities for the week included:

- Conducting perimeter air sampling.
- Loading asbestos-containing debris from the boiler room for off-site disposal.
- Completing all asbestos removal from the basement on Building No. 1.
- Demobilizing from the site for the Christmas holiday.

On 21, 22, 23, and 24 December 2009, a total of seven double-lined dump trailers were loaded with asbestos-containing debris to be sent to Ontario County Landfill in Stanley, New York for disposal (see Appendix D, Table 3).

On 23 and 24 December 2009, START and ERRS contractors demobilized from site for the Christmas holiday; security remained on site for the weekend.

Week of 28 December 2009

Personnel on site:

OSC – EPA	Brent England
START – Weston	SL Lauren Bolte Eric Ackerman
Response Manager – ER	Rick Ramuglia
Crew – ER (7 personnel)	1 Foreman 2 Operators

	1 Health and Safety Technician 3 Clean-up Technicians

Activities for the week included:

- Remobilizing ERRS and START crew members.
- Conducting perimeter air sampling.
- Loading of ACM from the boiler room off site for disposal.
- Hauling all the asbestos bags from the basement into a roll-off container.
- Loading asbestos-containing debris from the boiler room for off-site disposal.
- Completing visible friable asbestos removal from the first floor of Building No. 1.
- Removing transite from outside the south end of Building No. 1.
- Demobilizing from the site for the New Year holiday.

During the asbestos removal activities in Building No. 1, four 1-gallon containers with formic acid and six 50-pound bags with formaldehyde were discovered. These wastes were secured and were to be disposed of at a later date.

On 28 December 2009, one double-lined dump trailer was loaded with asbestos-containing debris to be sent to Ontario County Landfill in Stanley, New York for disposal.

On 30 and 31 December 2009, START and ERRS contractors demobilized from site for the New Year holiday; security remained on site for the weekend.

Week of 4 January 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos Brent England Marcus Holmes
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment removed from site: Week of 4 January

Type	Quantity
330C Excavator	1

Activities for the week included:

- Remobilizing ERRS and START crew members.
- Conducting perimeter air sampling.

- Removing asbestos from the pipes on the third and second floors of Building No. 2.
- Completing the load-out of asbestos-containing debris from the boiler room off site for disposal.
- Preparing for asbestos removal on the first floor and from the bleaching tank located on the second floor of Building No. 2.
- Conducting additional personal air sampling.

On 4 January 2010, one double-lined dump trailer was loaded with asbestos-containing debris to be sent to Ontario County Landfill in Stanley, New York for disposal.

All the asbestos-containing debris was removed from the boiler room in a total of eight dump trailers. The total weight of the disposed debris was 184.17 tons sent to Ontario County Landfill in Stanley, NY. All clean material was stockpiled between Building Nos. 2 and 3 in segregated piles of steel and timber.

All equipment was moved from Building No. 1 to Building No. 2. Prior to removing the asbestos from the bleaching tank, all the debris under the tank was removed and placed elsewhere in the building. When starting the asbestos removal in a different building, ERRS contractors performed personal air monitoring for lead in addition to asbestos for the first 3 days, as per the HASP. The personal air monitoring for asbestos continued throughout the removal action.

Week of 11 January 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (8 personnel)	1 Foreman 2 Operators 1 Health and Safety Technician 4 Clean-up Technicians

Equipment on site: End of the week of 11 January

Type	Quantity
330C Excavator	1

Activities for the week included:

- Conducting perimeter air sampling.
- Removing asbestos from the pipes on the first and second floors of Building No. 2.
- Building a platform and containment unit around the fabric bleaching tank for asbestos removal.
- Removing asbestos from the bleaching tank on the second floor of Building No. 2.

Week of 18 January 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (7 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 4 Clean-up Technicians

Equipment removed from site: the week of 18 January

Type	Quantity
Generator	2
Light Tower	2

Activities for the week included:

- Conducting perimeter air sampling.
- Removing asbestos from the fabric bleaching tank on the second floor of Building No. 2.
- Removing scrap metal from around and within the old foundation of Building No. 4 and stockpiling it between Building Nos. 2 and 3.
- Constructing entranceways to the basement of Building No. 2.

On 21 January 2010, HASP Amendment No. 1 was issued to permit required confined space entry (CSE) for asbestos removal from the basement of Building No. 2.

Week of 25 January 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (7 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 4 Clean-up Technicians

Equipment removed from site: Week of 25 January

Type	Quantity
Roll-Off Container	1

Activities for the week included:

- Conducting perimeter air sampling.
- Completing removal of scrap metal from around and within the old foundation of Building No. 4 and stockpiling it between Building Nos. 2 and 3.
- Loading out two roll-off containers for disposal.
- Conducting a CSE to remove asbestos from pipes in the basement of Building No. 2.
- Conducting a site walk of Building No. 3.
- Sampling debris ash found in the broken stack from the boiler room.

On 25 January 2010, two roll-off containers of ACM were loaded out for disposal at Ontario County Landfill in Stanley, NY. The two roll-off containers had a total volume of 60 yd^3, and an additional empty container was left on site.

Week of 1 February 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (6 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 3 Clean-up Technicians

Activities for the week included:

- Conducting perimeter air sampling.
- Removing scrap metal from around and within the old foundation of Building No. 5 and stockpiling it in the middle of the building foundation.
- Removing asbestos from the floor and pipes in the basement and from the first floor of the southwest section of Building No. 3.
- Completing asbestos removal from the basement of Building No. 2 and sealing all access points.
- Conducting a bid walk with demolition subcontractors.
- Removing two tanks from the old foundation of Building No. 5.

On 2 February 2010, two demolition companies arrived on site to discuss the planned demolition work of the structurally unsafe fire-damaged building sections, so they could prepare a bid proposal.

Week of 8 February 2010

Personnel on site:

OSC – EPA	Brent England
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (7 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 4 Clean-up Technicians

Activities for the week included:

- Conducting perimeter air sampling.
- Removing scrap metal from around and within the old foundation of Building No. 5 and adjusting the metal stockpile for debris stockpiling.
- Removing asbestos from the floor and pipes in the basement of the south section of Building No. 3.
- Stockpiling ACM debris from the old foundations of Building Nos. 4 and 5.

Week of 15 February 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (7 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 4 Clean-up Technicians

Activities for the week included:

- Conducting perimeter air sampling.
- Loading asbestos-containing debris from Building Nos. 4 and 5 for off-site disposal.
- Removing asbestos from the floor and pipes in the basement of Building No. 3.

On 17, 18, and 19 February 2010, eleven double-lined dump trailers were loaded with asbestos-containing debris to be sent to Ontario County Landfill in Stanley, New York for disposal.

Week of 22 February 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (7 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 4 Clean-up Technicians

Activities for the week included:

- Conducting perimeter air sampling.
- Loading asbestos-containing debris from Building Nos. 4 and 5 for off-site disposal.
- Removing asbestos from the floor and pipes in the basement of Building No. 3.
- Staging drums with unknown contents.
- Performing Hazard Categorization (HazCat) tests on 18 unknown drums.

On 23 February 2010, two double-lined dump trailers were loaded with asbestos-containing debris to be sent to Ontario County Landfill in Stanley, New York for disposal.

On 25 February 2010, Matt Sokop, Assistant Superintendent from City of Holyoke Department of Public Works, arrived on site to review the demolition operation and to discuss road closure and police detail with OSC Hatzopoulos.

To date, a total of 13 dump trailers of ACM debris were removed from Building Nos. 4 and 5. All debris was delivered to the Ontario County Landfill in Stanley, NY. Approximately 133 tons were removed from the Building No. 4 footprint, and 194 tons were removed from the footprint of Building No. 5 (see Appendix D, Table 3). All areas within the footprint of Building Nos. 4 and 5 that contained ACM debris above 1% were removed from the site. The ERRS Transportation and Disposal (T&D) Coordinator was on site and performed HazCat tests on waste materials (acids, caustics, flammables, solids, *etc.*) found in containers throughout the buildings. During the investigation of these containers, eight 55-gallon fiber drums filled with asbestos-containing pipe insulation were discovered in the basement of Building No. 3.

Week of 1 March 2010

Personnel on site:

OSC – EPA	Brent England
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (6 personnel)	1 Foreman 1 Operator

	1 Health and Safety Technician 3 Clean-up Technicians

Equipment on site: Additional equipment starting the week of 1 March

Type	Quantity
Roll-Off Container	1
100 Ton All-Terrain Crane	1
300 Excavator/ Swivel Grappler Head	1
Manlift	1

Activities for the week included:

- Conducting perimeter air sampling.
- Performing demolition operations on Building Nos. 3, 4, and 5.
- Removing transite from the second floor of Building No. 1.
- Stockpiling steel and timbers from debris created by the demolition.
- Segregating the boiler room smoke stack and covering it with polyethylene sheeting.

Demolition was conducted to make the area safer and to provide access to additional ACM locations. All the demolition work was conducted while performing dust control, using water from the canal to wet down the area. Both elevator shafts of Building No. 4 were razed to basement level. The second floor side walls, as well as the roof, were razed from Building No. 3; however, the interior wall structure remained intact. The southern side of Building No. 5, consisting of a pattern of archways, was razed to the bottom of the window sills.

Week of 8 March 2010

Personnel on site:

OSC – EPA	Brent England
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (6 personnel)	1 Foreman 1 Operator 1 Health and Safety Technician 3 Clean-up Technicians

Equipment removed from site: Starting the week of 8 March

Type	Quantity
100 Ton All-Terrain Crane	1
300 Excavator/ Swivel Grappler Head	1

Activities for the week included:

- Conducting perimeter air sampling.
- Removing transite from the first and second floors of Building No. 1.

- Stockpiling steel and timbers from within the debris created by the demolition.
- Collecting a PCB disposal sample from a transformer in the demolition debris.

On 10 March 2010, the ERRS contractor collected a sample of transformer oil for PCB analysis. Also on this date, OSC Hatzopoulos received Toxicity Characteristic Leaching Procedure (TCLP) analytical results for the metals sample collected from the boiler room smokestack. The results indicated that TCLP metals were not detected, permitting the material to be disposed of as non-hazardous [11].

Transite panels that were roof covers for the machines on the second floor of Building No. 1 were removed. On the first floor of Building No. 1, transite was removed from the garage doors, window openings, and a power supply cage. Except for transite that was part of the building's structure, all visible asbestos had been removed from Building No. 1.

Week of 15 March 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (5 personnel)	1 Foreman 1 Health and Safety Technician 3 Clean-up Technicians

Equipment on site: Starting the week of 15 March

Type	Quantity
Aerial Lift	1

Equipment removed from site: End of week 15 March

Type	Quantity
Manlift	1

Activities for the week included:

- Conducting perimeter air sampling.
- Removing all loose debris from the second floor of Building No. 3 that resulted from the demolition work.
- Removing asbestos from the first floor of Building No. 3.
- Preparing and staging the second floor of Building No. 3 for asbestos removal from the dryer unit.
- Removing asbestos from the dryer unit on the second floor of Building No. 3.

On 18 March 2010, ERRS contractors received analytical results for the transformer oil sample collected on 10 March 2010. Analytical results indicated that PCBs were not detected [12].

Asbestos pipe insulation was located on the first floor of Building No. 3. On the east side of the building, the pipes were approximately 20 feet from the ground surface; and on the west side of the building, the pipes were above a weak floor structure. All of these pipes were accessed by the aerial lift through the large window areas. After all the asbestos was removed from this floor, ERRS contractors were able to clear and prepare the area around the asbestos-covered drying unit on the second floor. Once this area was staged, they removed the asbestos from the dryer unit, using water for dust control and using burlap bags inside the polyethylene bags because of chicken wire wrapped within the asbestos.

Week of 22 March 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (5 personnel)	1 Foreman 1 Health and Safety Technician 3 Clean-up Technicians

Equipment removed from site: End of week 22 March

Type	Quantity
Roll-Off Container	1

Activities for the week included:

- Conducting perimeter air sampling.
- Removing all loose debris from the second floor of Building No. 3 that was caused by the demolition work.
- Removing asbestos from the first floor of Building No. 3.
- Removing asbestos from the dryer unit on the second floor of Building No. 3.
- Overpacking the containers of hazardous materials to dispose of off site.
- Collecting two transformer oil samples for PCB analysis.

On 22 March 2010, City of Holyoke members of the Fire Department, Police Department, Department of Public Works, and Management Assistance Program Department arrived on site for a site walk of the various changes to the site since the removal and demolition work.

On 23 March 2010, EPA met with the City of Holyoke's department directors and with representatives from MassDEP. EPA discussed the close out of the Parsons Paper Mill Removal Project, and the safety issues that would concern the City and MassDEP after EPA completes its work. During the meeting, Mitch Moskal informed EPA that two radiation sources existed in two machines on site.

On 23 March 2010, two roll-off containers of ACM and transite were loaded out for disposal at Ontario County Landfill in Stanley, NY. The two roll-off containers had a total volume of 60 yd^3. An additional container was left on site.

On 24 March 2010, the ERRS contractor collected two oil samples from another two transformers for PCB analysis.

Week of 29 March 2010

Personnel on site:

OSC – EPA	Tom Hatzopoulos
START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (5 personnel)	1 Foreman 1 Health and Safety Technician 3 Clean-up Technicians

Activities for the week included:

- Conducting perimeter air sampling.
- Removing all loose debris from the second floor of Building No. 3 that was caused by the demolition work.
- Removing transite panels from the second floor of Building No. 3.
- Removing asbestos from the dryer unit on the second floor of Building No. 3.
- Determining radiation levels of two machine parts that encased radioactive sources.
- Dismantling from each of the two machines, the machine parts containing the radioactive source for recycling.
- Building wooden covers for the ceramic basins.
- Overpacking the remaining containers necessary for disposal off site.

On 29 March 2010, ERRS contractors received analytical results for the transformer oil samples collected on 24 March 2010. Analytical results indicated that PCBs were not detected. All oil containers collected on site were drained for disposal, but the containers remained on site labeled as non-PCB [11].

On 30 March 2010, HASP Amendment No. 3 was issued to address the removal of radiation sources from two machines located in Building Nos. 1 and 3.

On 31 March 2010, EPA Health and Safety Officer, Anthony Honnellio, arrived on site to lead the radiation source removal. In addition, MassDEP representatives Dave Slowick and Larry Hanson were on site to view the radiation source removal and to receive a final site walk-through from OSC Hatzopoulos.

The radiation sources were located on machines from the second floor of Building No. 1 and from the second floor of Building No. 3. These sources were removed and recycled off site. Instruments

used to measure radiation confirmed that no residual radiation remained after the sources had been removed. The sources were stored in a 5-gallon bucket submersed in lead shot then a 55-gallon steel drum packed with bricks. The radiation levels surrounding the drum (1-2 inches away) were 20-50 microRoentgen per hour (μR/hr). Approximately 2 feet away from the drum, the radiation levels were back at the background level of 10 μR/hr. The steel drum was locked in the CONEX box on site. This storage was temporary, until the recycling center shipped a container that was allowed for transport.

Week of 5 April 2010

Personnel on site:

START – Weston	SL Lauren Bolte
Response Manager – ER	Rick Ramuglia
Crew – ER (4 personnel)	1 Foreman 3 Clean-up Technicians

Equipment removed from site: End of week 5 April

Type	Quantity
Decontamination Shower Trailer	1

Activities for the week included:

- Conducting perimeter air sampling.
- Completing asbestos removal from the dryer unit on the second floor, and ensuring no visible asbestos remained in Building No. 3.
- Draining the last of the transformer oil into containers for disposal off site.

On 6 April 2010, START personnel demobilized from the site.

Week of 12 April 2010

Personnel on site:

Response Manager – ER	Rick Ramuglia
Crew – ER (4 personnel)	1 Foreman 3 Clean-up Technicians

Equipment removed from site: End of week 12 April

Type	Quantity
Office Trailer	1
Crew Trailer	1
CONEX Box	1
Aerial Lift	1
Portable Toilet	3
Roll-Off Container	1
Wheeled Skid Steer	1

Activities for the week included:

- Installing chain-linked fence.
- Preparing to demobilize from site.
- Transporting the last roll-off container of ACM for disposal.
- Placing 'Non-Detect for PCBs-EPA 4/15/10' labels on all transformers that had their oil analyzed as such.
- Conducting a final site walk with OSC.
- Shipping the radiation sources to be recycled.

Chain-link fence was installed from the front gate of the site along Sargeant Street to the east side of Building No. 3. Two 10-foot swing gates were also installed next to Building No. 3 for truck access. An additional 50 feet of chain-link fence was installed at the easternmost penstock along the First Level Canal. These fence sections were added to the site during demobilization for additional safety and security on the site. Doorways that were accessed by EPA during this removal were closed over with plywood sheeting. A high-visible fence was installed around the excavation area on the west end of Building No. 5 where the large steel tanks were removed. A final inspection/walk-through of the site was conducted with OSC Hatzopoulos, he reviewed the buildings for signs of any remaining ACM or safety hazards.

On 15 April 2010, the last roll-off container on site, having a total volume of 30 yd^3, was collected for disposal to the Ontario County Landfill in Stanley, NY (see Appendix D, Table 3).

On 16 April 2010, the radiation source on site was shipped to Qual-X, Inc. in Powell, OH for recycling. Also on this date, all ER personnel demobilized from site and site security was terminated (see Appendix D, Table 5).

Week of 19 April 2010

Personnel on site:

OSC – EPA	Brent England
Crew – ER	1 Foreman

Equipment removed from site: End of week 19 April

Type	Quantity
CONEX Box	1

Activities for the week included:

- Consolidating and disposing of 19 55-gallon drums.
- Demobilizing all personnel and equipment.

On 21 April 2010, 19 drums were transported to Complete Recycling Solutions of Fall River, MA, ENPRO Services of Williston, VT, EQ of Detroit, MI, and Vexor Technology of Medina, OH for disposal (see Appendix D, Tables 4 and 5).

On 26 April 2010, all activities were completed, and personnel demobilized from the site.

4.0 ESTIMATED COSTS OF THE REMOVAL ACTION

EPA resources committed under this Removal Action are summarized below:

Cost Category	Ceiling	Costs Incurred	Remainder
Regional Removal Allowance Costs			
ERRS	**$1,300,000**	**$819,476**	**$480,524**
Other Extramural Costs Not Funded from the Regional Allowance			
START Contractor	**$200,000**	**$164,232**	**$35,768**
Extramural Contingency	**$300,000**	**$0**	**$300,000**
Total Removal Project Costs	**$1,800,000**	**$983,708**	**$816,292**

This accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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[1] U.S. Geological Survey (USGS). 1981. Springfield North, Massachusetts. (7.5-minute series topographic map).

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Appendices

Appendix A

Figures

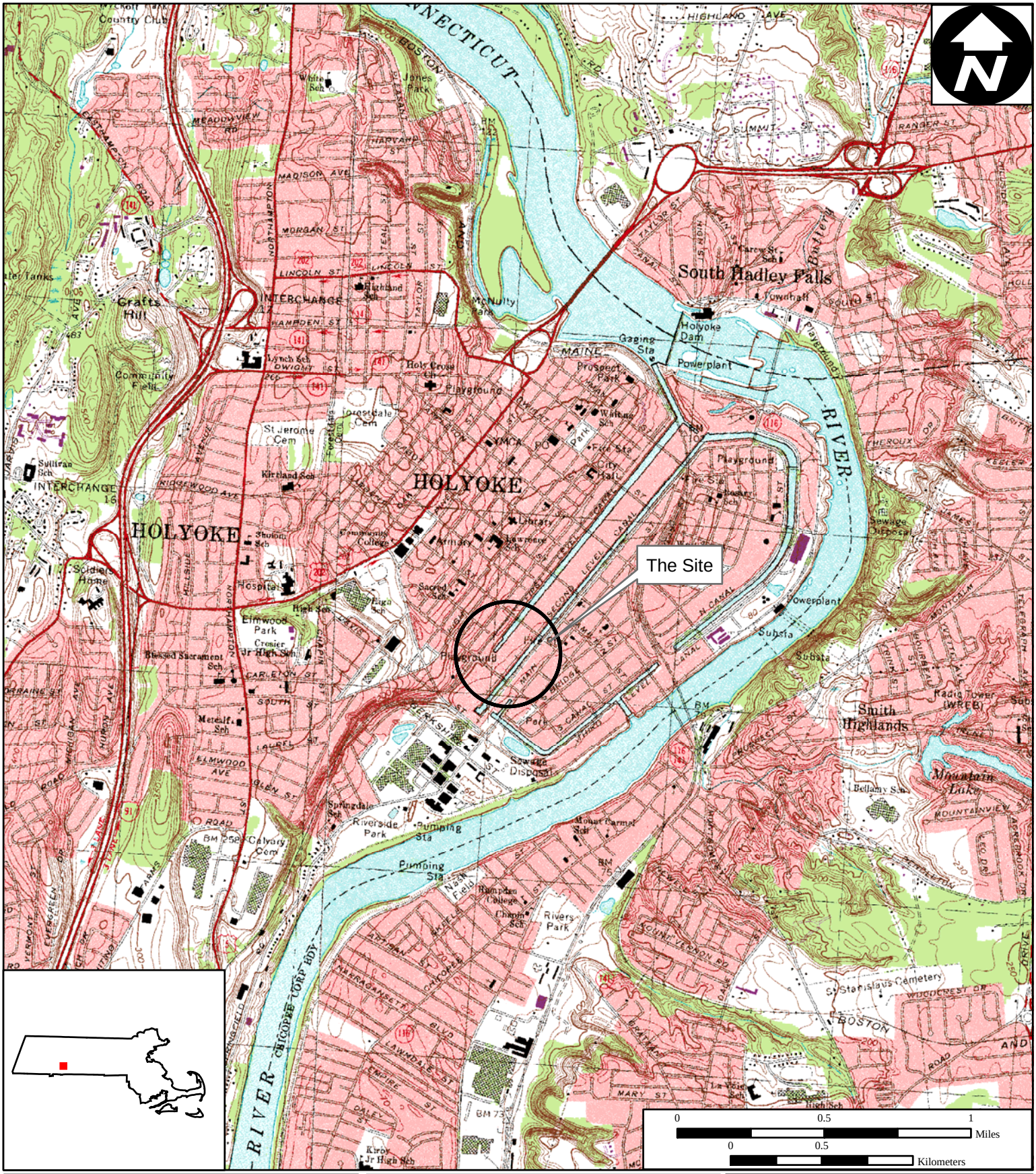

Figure 1

Site Location Map

Parsons Paper Mill
84 Sargeant Street
Holyoke, Massachusetts

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	09-09-0006
Created by:	Noah Kutsch
Created on:	2 September 2009
Modified by:	Bonnie Mace
Modified on:	7 October 2009

Data Sources:
Topos: MicroPath/USGS
Quadrangle Name(s): Springfield North, MA. 1981.
All other data: START

WESTON SOLUTIONS
Restoring Resource Efficiency

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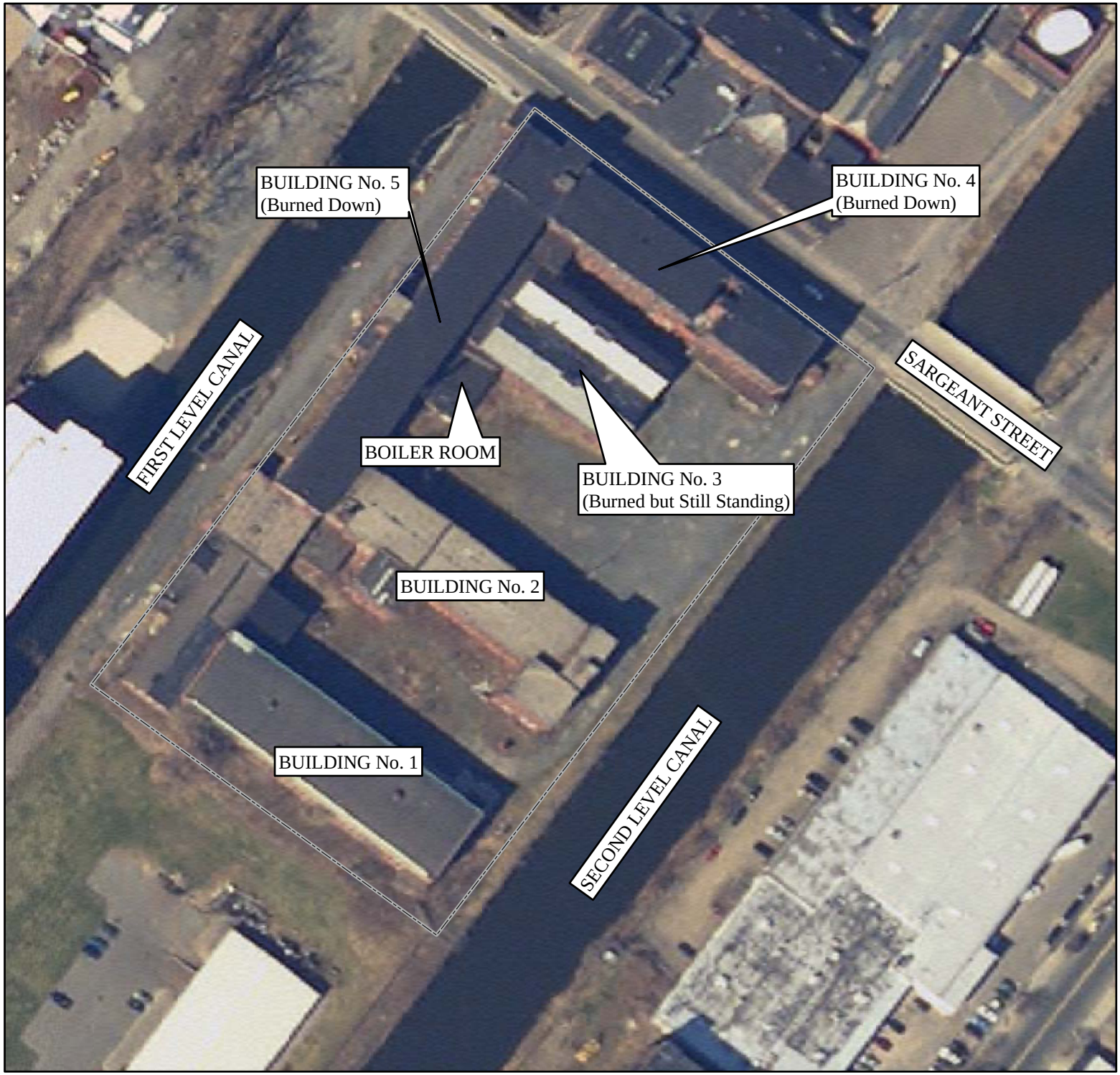

Figure 2

Site Diagram

Parsons Paper Mill
84 Sargeant Street
Holyoke, Massachusetts

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number: 09-09-0006
Created by: Bonnie Mace
Created on: 9 October 2009
Modified by: Lauren Bolte
Modified on: 7 April 2010

LEGEND

Site Boundary

N

0 25 50
Feet

Data Sources:
Imagery: Massachusetts Geographic Information System (MassGIS), Image No. 109882
Topos: MicroPath
All other data: START

WESTON SOLUTIONS
Restoring Resource Efficiency

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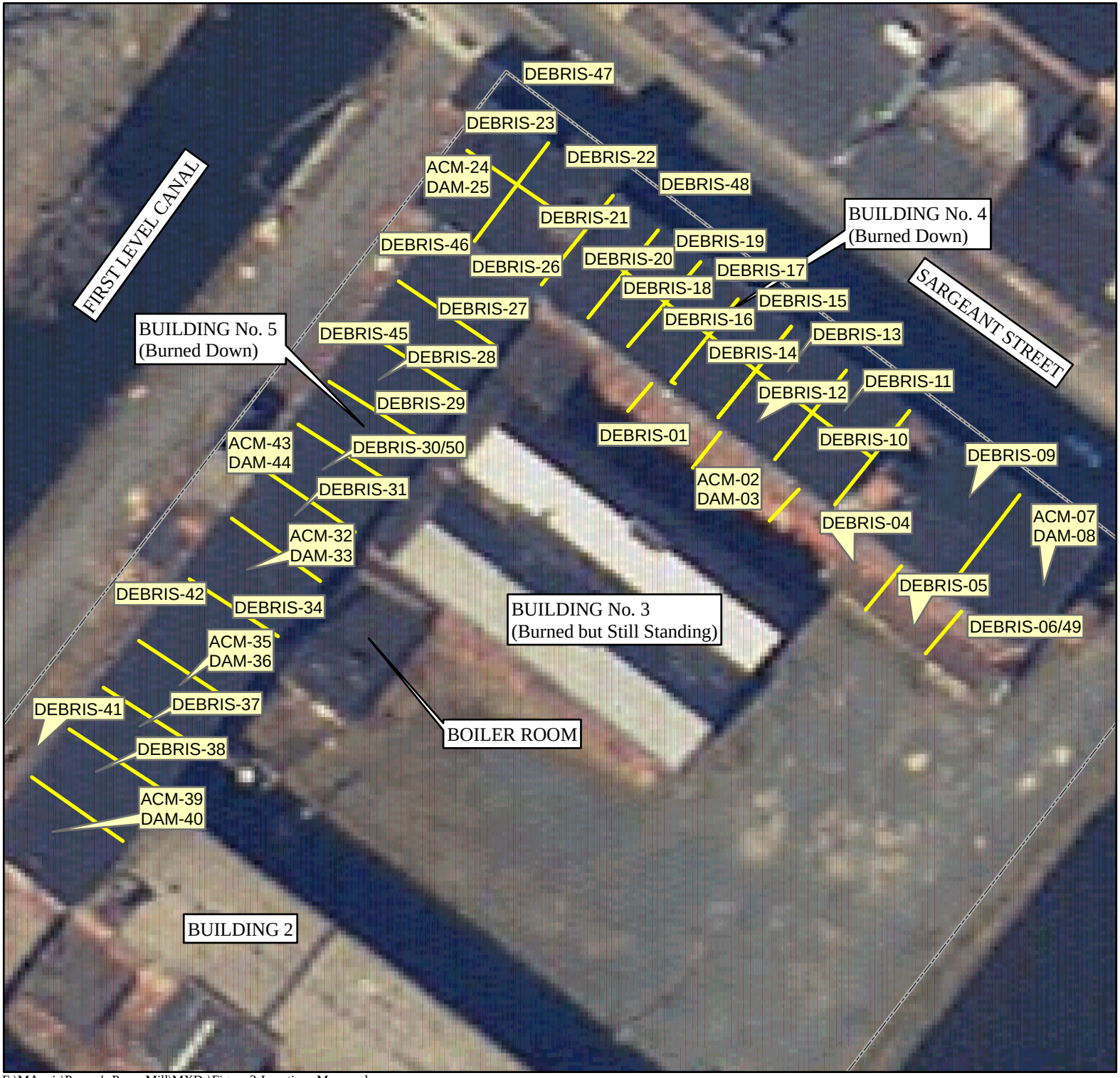

Figure 3

Debris Sample Locations Map

Parsons Paper Mill
84 Sargeant Street
Holyoke, Massachusetts

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	09-09-0006
Created by:	L. BOLTE
Created on:	19 APRIL 2010
Modified by:	L. BOLTE
Modified on:	01 JULY 2010

LEGEND

Sample Area

Site Boundary

N

0 12.5 25 Feet

Data Sources:

Imagery: Massachusetts Geographic Information System (MassGIS), Image No. 109882
Topos: MicroPath
All other data: START

WESTON SOLUTIONS
Restoring Resource Efficiency

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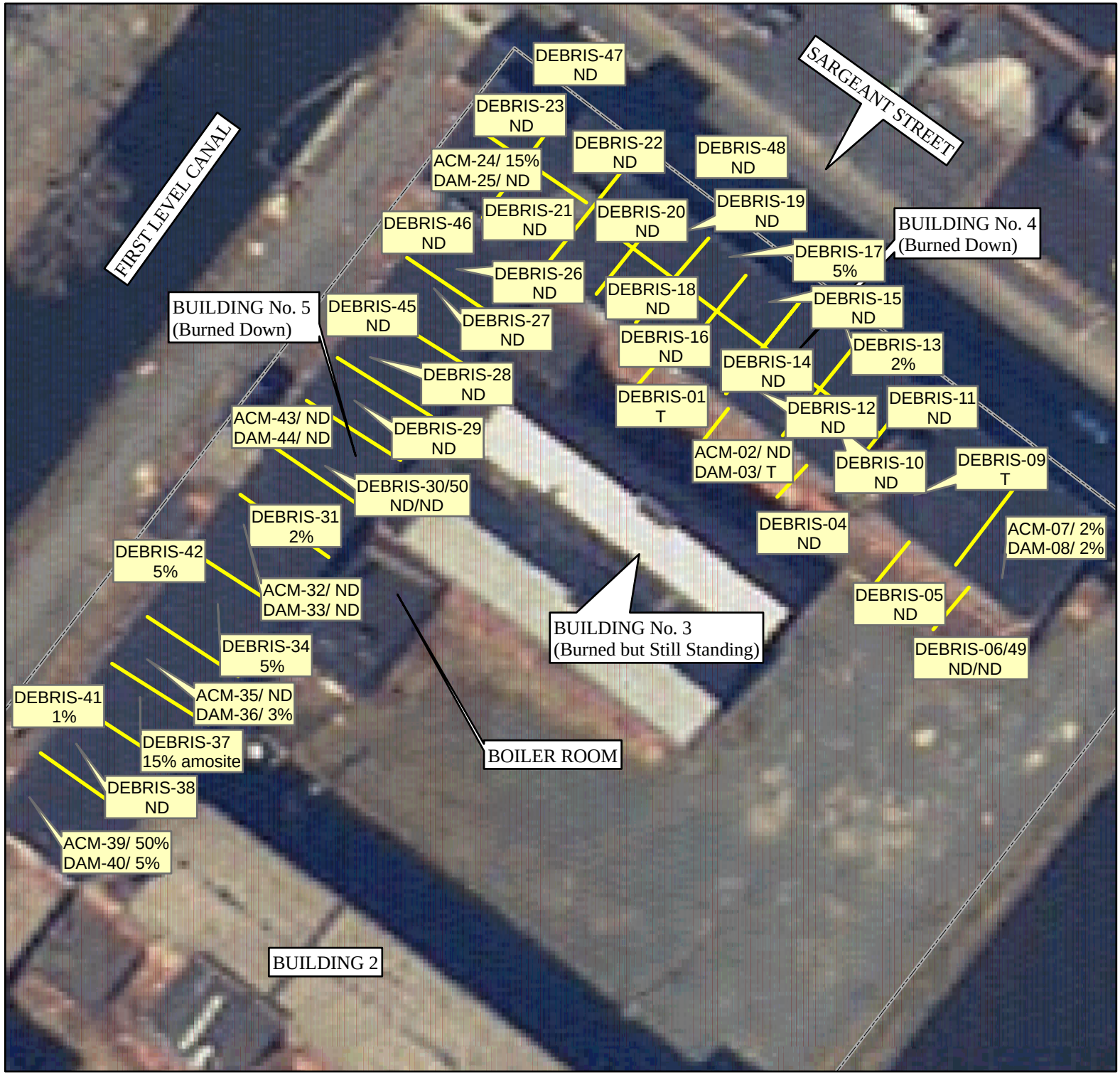


Figure 4

Debris Sample Results Map

Parsons Paper Mill
84 Sargeant Street
Holyoke, Massachusetts

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	09-09-0006
Created by:	L. BOLTE
Created on:	19 APRIL 2010
Modified by:	L. BOLTE
Modified on:	01 JULY 2010

LEGEND

Sample Area
Site Boundary

All results are in % chrysotile unless otherwise noted.
T = trace amounts
ND = not detected

N

0 12.5 25
Feet

Data Sources:
Imagery: Massachusetts Geographic Information System (MassGIS), Image No. 109882
Topos: MicroPath
All other data: START

WESTON SOLUTIONS
Restoring Resource Efficiency

E:\MA_gis\Parson's Paper Mill\MXDs\Figure 4-Results Map.mxd

Appendix B

Analytical Tables

TABLE 1

DEBRIS SAMPLE DESCRIPTIONS
PARSONS PAPER MILL
HOLYOKE, MASSACHUSETTS

Sample Location (Scribe No.)	Sample Date	Sample Time	Sample Matrix	Sample Collection	Sample Depth (inches)	Sample Source/ Description
DEBRIS-01 (R01-091117AH-0001)	11/18/2009	1000	DEBRIS	Composite	0-12	Medium to dark brown soil-like debris from outside the footprint of Bldg No. 4 on the south side.
ACM-02 (R01-091117AH-0002)	11/18/2009	1010	ACM	Grab	NA	White fibrous material located outside the footprint of Bldg No. 4 on the south side.
DAM-03 (R01-091117AH-0003)	11/18/2009	1015	DEBRIS	Composite	0-6	Black ash with some white threaded material throughout located outside the footprint of Bldg No. 4 on the south side.
DEBRIS-04 (R01-091117AH-0004)	11/18/2009	1020	DEBRIS	Composite	0-36	Mostly crushed bricked with mortar fragments throughout located outside the footprint of Bldg No. 4.
DEBRIS-05 (R01-091117AH-0005)	11/18/2009	1030	DEBRIS	Composite	0-48	Burnt ash with white threaded material within the sample located outside the footprint of Bldg No. 4.
DEBRIS-06 (R01-091117AH-0006)	11/18/2009	1100	DEBRIS	Composite	0-48	Mostly crushed brick with mortar fragments throughout located outside the footprint of Bldg No. 4.
ACM-07 (R01-091117AH-0007)	11/18/2009	1110	ACM	Grab	44-48	Green tile.
DAM-08 (R01-091117AH-0008)	11/18/2009	1120	DEBRIS	Composite	0-48	Black ash and some burnt wood collected around the general area where the tile (ACM-07) was collected.
DEBRIS-09 (R01-091117AH-0009)	11/18/2009	1235	DEBRIS	Composite	0-48	Black ash and crushed brick collected under large steel pile.
DEBRIS-10 (R01-091117AH-0010)	11/18/2009	1320	DEBRIS	Composite	0-48	Black ash and crushed brick with some tile fragments.
DEBRIS-11 (R01-091117AH-0011)	11/18/2009	1345	DEBRIS	Composite	0-48	Mainly black ash with some crushed brick.
DEBRIS-12 (R01-091117AH-0012)	11/18/2009	1350	DEBRIS	Composite	0-48	Mainly black ash with some crushed brick and mortar fragments throughout.
DEBRIS-13 (R01-091117AH-0013)	11/18/2009	1400	DEBRIS	Composite	0-48	Black ash.
DEBRIS-14 (R01-091117AH-0014)	11/18/2009	1420	DEBRIS	Composite	0-48	Mainly black ash with some crushed brick and mortar fragments throughout.
DEBRIS-15 (R01-091117AH-0015)	11/18/2009	1425	DEBRIS	Composite	0-48	Black ash and burnt wood.
DEBRIS-16 (R01-091117AH-0016)	11/18/2009	1440	DEBRIS	Composite	0-48	Black ash.

TABLE 1

DEBRIS SAMPLE DESCRIPTIONS
PARSONS PAPER MILL
HOLYOKE, MASSACHUSETTS

Sample Location (Scribe No.)	Sample Date	Sample Time	Sample Matrix	Sample Collection	Sample Depth (inches)	Sample Source/ Description
DEBRIS-17 (R01-091117AH-0017)	11/18/2009	1445	DEBRIS	Composite	0-48	Mainly black ash with some crushed brick.
DEBRIS-18 (R01-091117AH-0018)	11/18/2009	1500	DEBRIS	Composite	0-48	Black ash with some tile fragments.
DEBRIS-19 (R01-091117AH-0019)	11/18/2009	1550	DEBRIS	Composite	0-48	Black ash with some long, white fibrous material collected in the sample.
DEBRIS-20 (R01-091117AH-0020)	11/18/2009	1600	DEBRIS	Composite	0-48	Black ash with some white threaded material throughout.
DEBRIS-21 (R01-091117AH-0021)	11/19/2009	845	DEBRIS	Composite	0-48	Gray soil-like debris with crushed brick and various broken up fragments of debris.
DEBRIS-22 (R01-091117AH-0022)	11/19/2009	900	DEBRIS	Composite	0-36	Gray soil-like debris with crushed brick.
DEBRIS-23 (R01-091117AH-0023)	11/19/2009	830	DEBRIS	Composite	0-48	Black ash and burnt wood and paper.
ACM-24 (R01-091117AH-0024)	11/19/2009	1010	ACM	Grab	12-15	Green tile.
DAM-25 (R01-091117AH-0025)	11/19/2009	1015	DEBRIS	Composite	0-48	Light brown soil-like debris collected around the general area of where the tile (ACM-24) was collected.
DEBRIS-26 (R01-091117AH-0026)	11/19/2009	1050	DEBRIS	Composite	0-48	Gray-black burnt wood and fragments of white threaded material.
DEBRIS-27 (R01-091117AH-0027)	11/19/2009	1100	DEBRIS	Composite	0-48	Black ash and some fibrous-like material.
DEBRIS-28 (R01-091117AH-0028)	11/19/2009	1120	DEBRIS	Composite	0-48	Black ash.
DEBRIS-29 (R01-091117AH-0029)	11/19/2009	1130	DEBRIS	Composite	0-48	Black ash.
DEBRIS-30 (R01-091117AH-0030)	11/19/2009	1245	DEBRIS	Composite	0-48	Black and red ash and crushed brick with some burnt wood.
DEBRIS-31 (R01-091117AH-0031)	11/19/2009	1320	DEBRIS	Composite	0-48	Black ash with some white glue-like material.
ACM-32 (R01-091117AH-0032)	11/19/2009	1350	ACM	Grab	30-36	Burnt pieces of a white fibrous-like material.

TABLE 1

DEBRIS SAMPLE DESCRIPTIONS
PARSONS PAPER MILL
HOLYOKE, MASSACHUSETTS

Sample Location (Scribe No.)	Sample Date	Sample Time	Sample Matrix	Sample Collection	Sample Depth (inches)	Sample Source/ Description
DAM-33 (R01-091117AH-0033)	11/19/2009	1355	DEBRIS	Composite	0-48	Black ash with some white glue-like material around where the fibrous material (ACM-32) was collected.
DEBRIS-34 (R01-091117AH-0034)	11/19/2009	1400	DEBRIS	Composite	0-48	Black and red ash and crushed brick.
ACM-35 (R01-091117AH-0035)	11/19/2009	1420	ACM	Grab	24-30	White fibrous-like material.
DAM-36 (R01-091117AH-0036)	11/19/2009	1425	DEBRIS	Composite	0-48	Black and red ash and crushed brick in the general area of ACM-35.
DEBRIS-37 (R01-091117AH-0037)	11/19/2009	1430	DEBRIS	Composite	0-48	Black ash with some white glue-like material.
DEBRIS-38 (R01-091117AH-0038)	11/19/2009	1445	DEBRIS	Composite	0-48	Black ash with tile fragments throughout the sample.
ACM-39 (R01-091117AH-0039)	11/19/2009	1615	ACM	Grab	NA	White brittle material collected from around the tank in the footprint of Bldg No. 5.
DAM-40 (R01-091117AH-0040)	11/19/2009	1420	DEBRIS	Composite	0-36	Black ash with some white brittle fragments around where the tank area Sample (ACM-39) was collected.
DEBRIS-41 (R01-091117AH-0041)	11/19/2009	1430	DEBRIS	Composite	0-36	Crushed brick collected outside the footprint of Bldg No. 5.
DEBRIS-42 (R01-091117AH-0042)	11/20/2009	730	DEBRIS	Composite	0-36	Red crushed brick with some white mortar fragments throughout, outside the footprint of Bldg No. 5.
ACM-43 (R01-091117AH-0043)	11/20/2009	745	ACM	Grab	10-12	Green tile-like.
DAM-44 (R01-091117AH-0044)	11/20/2009	750	DEBRIS	Composite	0-48	Black ash and red crushed brick with some tile fragments collected not far from ACM-43, outside the footprint of Bldg No. 5.
DEBRIS-45 (R01-091117AH-0045)	11/20/2009	800	DEBRIS	Composite	0-36	Gray and red crushed brick and burnt material collected outside the footprint of Bldg No. 5.
DEBRIS-46 (R01-091117AH-0046)	11/20/2009	815	DEBRIS	Composite	0-48	Gray and red crushed brick and burnt material collected outside the footprint of Bldg No. 5.
DEBRIS-47 (R01-091117AH-0047)	11/20/2009	830	DEBRIS	Composite	0-36	Gray and red crushed brick and burnt material collected outside the footprint of Bldg No. 4 on the north side.
DEBRIS-48 (R01-091117AH-0048)	11/20/2009	840	DEBRIS	Composite	0-36	Gray and red crushed brick and burnt material with some white fibrous-like material collected, outside the footprint of Bldg No. 4 on the north side.

TABLE 1

DEBRIS SAMPLE DESCRIPTIONS
PARSONS PAPER MILL
HOLYOKE, MASSACHUSETTS

Sample Location (Scribe No.)	Sample Date	Sample Time	Sample Matrix	Sample Collection	Sample Depth (inches)	Sample Source/ Description
DEBRIS-49 (R01-091117AH-0049)	11/18/2009	1100	DEBRIS	Composite	0-48	Field duplicate of DEBRIS-06.
DEBRIS-50 (R01-091117AH-0050)	11/19/2009	1245	DEBRIS	Composite	0-48	Field duplicate of DEBRIS-30.
ACM-51 (R01-091117AH-0051)	11/20/2009	845	ACM	Grab	NA	White, soft and fibrous-like material collected from pipe insulation on the first floor of Bldg No. 2.
ACM-52 (R01-091117AH-0052)	11/20/2009	850	ACM	Grab	NA	White, brittle material collected from pipe insulation on the second floor of Bldg No. 2.
ACM-53 (R01-091117AH-0053)	11/20/2009	900	ACM	Grab	NA	White, hard material wrapped in chicken wire, collected from the fabric bleach tank located on the second floor of Bldg No. 2.
ACM-54 (R01-091117AH-0054)	11/20/2009	915	ACM	Grab	NA	Gray, soft and fibrous-like material collected from pipe insulation on the first floor of Bldg No. 1.
ACM-55 (R01-091117AH-0055)	11/25/2009	1015	ACM	Grab	NA	Yellowish fiber-glass collected from the inner insulation layer of the dryer unit on the second floor of Bldg No. 3.
ACM-56 (R01-091117AH-0056)	11/25/2009	1020	ACM	Grab	NA	White/gray cardboard-like material collected from the outer insulation layer of the dryer unit on the second floor of Bldg No. 3.

NA = Not Applicable
ACM = Asbestos-Containing Material
DAM = debris around material
No. = Number
Bldg = building

TABLE 2

SUMMARY OF BULK ASBESTOS ANALYSIS RESULTS
DEBRIS SAMPLES
PARSONS PAPER MILL SITE
HOLYOKE, MASSACHUSETTS

SAMPLE LOCATION SAMPLE NUMBER DEPTH	DEBRIS-01 AB00060 0-1 ft.	DAM-03 AB00062 0-0.5 ft.	ACM-07 AB00066 3.5-4 ft.	DAM-08 AB00067 0-4 ft.	DEBRIS-09 AB00068 0-4 ft.	DEBRIS-13 AB00071 0-4 ft.	LAB REPORTING LIMIT
COMPOUND							
Amosite	ND	ND	ND	ND	ND	ND	1
Chrysotile	Trace	Trace	**2**	**2**	Trace	**2**	1

SAMPLE LOCATION SAMPLE NUMBER DEPTH	DEBRIS-17 AB00076 0-4 ft.	ACM-24 AB00083 1-1.5 ft.	DEBRIS-31 AB00090 0-4 ft.	DEBRIS-34 AB00093 0-4 ft.	DAM-36 AB00095 0-4 ft.	DEBRIS-37 AB00096 0-4 ft.	LAB REPORTING LIMIT
COMPOUND							
Amosite	ND	ND	ND	ND	ND	**15**	1
Chrysotile	**5**	**15**	**2**	**5**	**3**	ND	1

NOTES:

1) Samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using EPA Region I SOP, EIASOP-INGASBSD2, Bulk Asbestos Analysis by Polarized Light Microscopy (PLM).
2) All results in volume percent.
3) ACM = Asbestos-Containing Material.
4) DAM = Debris Around Material.
5) Bolded and shaded results exceed the laboratory reporting limit and were addressed during excavation.
6) ND = Not Detected.
7) ft. = feet
8) NA = not applicable

TABLE 2

SUMMARY OF BULK ASBESTOS ANALYSIS RESULTS
DEBRIS SAMPLES
PARSONS PAPER MILL SITE
HOLYOKE, MASSACHUSETTS

SAMPLE LOCATION SAMPLE NUMBER DEPTH	ACM-39 AB00098 0 ft.	DAM-40 AB00099 0-3 ft.	DEBRIS-41 AB00100 0-3 ft.	ACM-51 AB00110 NA	ACM-52 AB00111 NA	ACM-53 AB00112 NA	LAB REPORTING LIMIT
COMPOUND							
Amosite	ND	ND	ND	ND	ND	ND	1
Chrysotile	**50**	**5**	1	**15**	**25**	**10**	1

SAMPLE LOCATION SAMPLE NUMBER DEPTH	ACM-54 AB00113 NA	ACM-56 AB00174 NA					LAB REPORTING LIMIT
COMPOUND							
Amosite	ND	ND					1
Chrysotile	**25**	**15**					1

NOTES:

1) Samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using EPA Region I SOP, EIASOP-INGASBSD2, Bulk Asbestos Analysis by Polarized Light Microscopy (PLM).
2) All results in volume percent.
3) ACM = Asbestos-Containing Material.
4) DAM = Debris Around Material.
5) Bolded and shaded results exceed the laboratory reporting limit and were addressed during excavation.
6) ND = Not Detected.
7) ft. = feet
8) NA = not applicable

Appendix C

Photodocumentation Log

PHOTOGRAPHY LOG SHEET
Parsons Paper Mill ● Holyoke, Massachusetts

SCENE: View of Building Numbers (Nos.) 3 and 4 on the site prior to the June 2008 fire. Photograph taken facing northwest.
DATE: 30 May 2008 **TIME:** 1107 hours
PHOTOGRAPHER: Holyoke Fire Department **CAMERA:** Canon EOS Digital Rebel XT

SCENE: View of Building Nos. 3 and 4 following the June 2008 fire. Photograph taken facing northwest.

DATE: 2 December 2009 **TIME:** 0932 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the site during the June 2008 fire. Photograph taken facing northwest.

DATE: 9 June 2008 **TIME:** 1739 hours
PHOTOGRAPHER: Holyoke Gas & Electric **CAMERA:** Canon PowerShot S3 IS

SCENE: View of Building No. 4 immediately following the fire. Photograph taken facing west.

DATE: 10 June 2008 **TIME:** 0841 hours
PHOTOGRAPHER: Holyoke Gas & Electric **CAMERA:** HP Photosmart 315

SCENE: View of the asbestos-containing material (ACM) sample, ACM-54, from pipe insulation on the first floor of Building No. 1.

DATE: 16 December 2009 **TIME:** 0718 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the pipes following asbestos removal in the area where ACM-54 was previously located.

DATE: 05 January 2010 **TIME:** 0746 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the garage on the first floor of Building No. 1, with transite wall panels.

DATE: 16 December 2009 **TIME:** 0719 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the garage on the first floor of Building No. 1, with all the transite wall panels removed.

DATE: 11 March 2010 **TIME:** 1258 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the boiler room (abutting Building No. 3) prior to debris removal. Photograph taken facing north.

DATE: 7 December 2009 **TIME:** 1033 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of debris and ACM removal from the boiler room. Photograph taken facing northwest.

DATE: 16 December 2009 **TIME:** 1106 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the boiler room area following debris and ACM removal. Photograph taken facing north.

DATE: 18 December 2009 **TIME:** 1420 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the pipe insulation on the third floor of Building No. 2 prior to removal.

DATE: 29 December 2009 **TIME:** 1027 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the horizontal pipes on the third floor of Building No. 2 following asbestos removal.

DATE: 06 January 2010 **TIME:** 0825 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the fabric bleaching tank turned and cleared of all loose debris underneath it. Bulk asbestos sample ACM-53 was collected from this tank.
DATE: 08 January 2010 **TIME:** 0816 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the containment unit built around the bleaching tank prior to ACM removal.

DATE: 15 January 2010 **TIME:** 0803 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of ACM removed from the bleaching tank.

DATE: 15 January 2010 **TIME:** 1525 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the bleaching tank with ACM removed and with the area decontaminated and the containment unit removed.
DATE: 22 January 2010 **TIME:** 1252 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of preparation for ACM removal in the basement of Building No. 2.

DATE: 2 February 2010 **TIME:** 1613 hours
PHOTOGRAPHER: G. Wynter **CAMERA:** HP Photosmart M22

SCENE: View of the pipes in the basement of Building No. 2 following ACM removal.

DATE: 2 February 2010 **TIME:** 1606 hours
PHOTOGRAPHER: G. Wynter **CAMERA:** HP Photosmart M22

SCENE: View of the sealed-off Confined Space Entrance 1 on the first floor of Building No. 2, following ACM removal in that section of the basement.
DATE: 2 February 2010 **TIME:** 0752 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the fiber drums filled with ACM that were located in a holding chest in the basement of Building No. 3.

DATE: 24 February 2010 **TIME:** 0747 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of containers on site that were collected, Hazard Categorized (HazCatted), consolidated, overpacked, and then disposed of off site.
DATE: 23 February 2010 **TIME:** 1001 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the overpacking of a container of sulfuric acid to be disposed of off-site. Photograph taken facing south.

DATE: 25 March 2010 **TIME:** 1036 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of one of the two Krypton-85 (KR-85) radiation sources located on site.

DATE: 29 March 2010 **TIME:** 1245 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Parsons Paper Mill ● Holyoke, Massachusetts

SCENE: View of the radiation source removed from the second floor of Building No. 1.

DATE: 1 April 2010 **TIME:** 1010 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the ACM pipe insulation on the first floor of the west section of Building No. 3 prior to removal.

DATE: 16 March 2010 **TIME:** 1103 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of High Efficiency Particulate Air (HEPA) vacuuming of the window sills after the pipe insulation removal beneath the first floor pipes of Building No. 3. The windows were the point of entry for the ACM removal since the floor was unsafe. Photograph taken facing north.

DATE: 17 March 2010 **TIME:** 0753 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the pipes on the first floor of the west section of Building No. 3 following ACM removal.

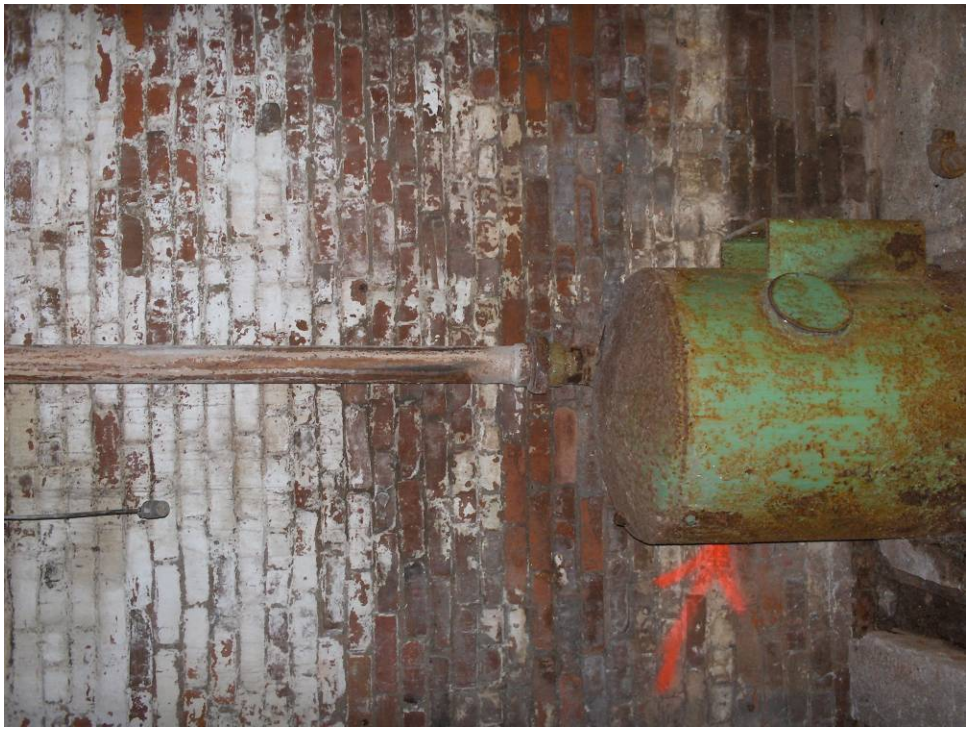
DATE: 17 March 2010 **TIME:** 0750 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

TOP

SCENE: View of a boiler with ACM pipe insulation in the basement of the southwest section of Building No. 3.

DATE: 28 January 2010 **TIME:** 1030 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

TOP



SCENE: View of a boiler in the basement of the southwest section of Building No. 3 following ACM removal.

DATE: 16 February 2010 **TIME:** 1157 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the ACM-covered dryer unit on the second floor of Building No. 3 prior to any demolition work or ACM removal.
DATE: 29 December 2009 **TIME:** 1058 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the dryer unit on the second floor of Building No. 3 during ACM removal following the demolition. Photograph taken facing east.
DATE: 19 March 2010 **TIME:** 1113 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the dryer unit following ACM removal. Photograph taken facing northwest.

DATE: 6 April 2010 **TIME:** 1008 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the ceramic basins that were exposed after demolition work and covered for safety at the end of the removal project. Photograph taken facing northeast.

DATE: 5 April 2010 **TIME:** 0736 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of Building No. 3 following all demolition and ACM removal. Photograph taken facing north.

DATE: 6 April 2010 **TIME:** 0702 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the remains of Building No. 4 at the start of the removal project. Photograph taken facing north.

DATE: 2 December 2009 **TIME:** 1352 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the ACM debris stockpiled for load out from the contaminated areas of Debris Samples 7,8,13, and 17.

DATE: 9 February 2010 **TIME:** 1517 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of Building No. 4 during demolition work. Photograph taken facing north.

DATE: 5 March 2010 **TIME:** 0822 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of location of former Building No. 4 following demolition. Photograph taken facing north.

DATE: 16 March 2010 **TIME:** 0727 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of the remains of Building No. 5 at the start of the removal project. Photograph taken facing south.

DATE: 2 December 2009 **TIME:** 1529 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Parsons Paper Mill ● Holyoke, Massachusetts

SCENE: View of the two tanks removed from the footprint of Building No. 5. The smaller tank required ACM removal. Photograph taken facing south.
DATE: 8 February 2010 **TIME:** 0804 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

SCENE: View of Building No. 5 following demolition, and after steel stockpiling was completed. Photograph taken facing south.
DATE: 15 March 2010 **TIME:** 1027 hours
PHOTOGRAPHER: L. Bolte **CAMERA:** HP Photosmart M22

Appendix D

Waste Disposal Summary Tables

Table 3 – Special Waste
Table 4 – Non-hazardous Waste
Table 5 – Hazardous Waste

TABLE 3
WASTE DISPOSAL SUMMARY TABLE
SPECIAL WASTE
PARSONS PAPER MILL SITE
HOLYOKE, MASSACHUSETTS

ACM Debris from the Boiler Room

DATE:	12/21/2009		12/22/2009		12/23/2009		12/24/2009	12/28/2009	1/4/2010	Total for Boiler Room Area
WEIGHT OF LOAD REMOVED:	22.52	23.87	28.72	25.16	24.35	28.72	21.51	30.15	25.56	230.56 tons
WEIGHT TICKET NUMBER:	334971	335021	326068	326066	326301	326313	326518	326940	327591	7 trailer loads
TRAILER PLATE NUMBER:	NY AD69359	NY AS10410	NY AD69459	NY AS10409	NY AD69501	NY AD69359	NY AD69501	NY AU52984	NY AD69359	32.94 avg. load

ACM Debris from Building No. 4 and No. 5

DATE:	2/17/2010		2/18/2010				2/19/2010				
WEIGHT OF LOAD REMOVED:	21.18	23.54	25.2	33.8	29.26	24.97	24.04	24.47	24.59	23.2	26.19
WEIGHT TICKET NUMBER:	333942	333943	334241	334246	334265	334302	334459	334461	334464	334501	334517
TRAILER PLATE NUMBER:	MA 77368	MA 77369	NY AS10410	NY AD69459	NY AS10407	NY AU52984	NY AS10408	MA 77369	MA 77368	MA 78736	NY AS10409

DATE:	2/23/2010									Total for Bldg Nos. 4 & 5 Area
WEIGHT OF LOAD REMOVED:	22.52	23.87								326.83 tons
WEIGHT TICKET NUMBER:	334971	335021								13 trailer loads
TRAILER PLATE NUMBER:	MA 77368	NY AD80431								25.14 avg. load

Total for ACM Debris Removed from Site
557.39 tons
20 trailer loads
27.87 avg. load

NOTE:

All debris was transported to the Ontario County Landfill, 355 Post Farm Road, Stanley, NY 14561.
Debris removed daily by New England Disposal Technology Inc. of Sutton, MA and Cason of Duanesburg, NY.
Weight of load removed = Tons
MA = Massachusetts
NY = New York
ACM = asbestos-containing material
avg. = average
Bldg = building
No. = number

* Additionally, a total volume of 150 cubic yards of asbestos and transite was removed from site in five double-lined roll-off containers (Container Nos. 30051, 30030, 30054,unk, and 30051) to be disposed of in the same landfill.

TABLE 4
WASTE DISPOSAL SUMMARY TABLE
NON-HAZARDOUS WASTE
PARSONS PAPER MILL SITE
HOLYOKE, MASSACHUSETTS

Containers from inside Building Nos. 1 through 3

WASTE	QUANTITY		DISPOSAL METHOD					Total for Non-Haz Waste
Transformer/ used oil	3	Drums	fuels blending					8 Drums
Liquids	5	Drums	treatment/discharge					

NOTE:

All drums were transported to Vexor Technologies of Medina, Ohio.
Nos. = numbers
Non-Haz = non-hazardous

TABLE 5
WASTE DISPOSAL SUMMARY TABLE
HAZARDOUS WASTE
PARSONS PAPER MILL SITE
HOLYOKE, MASSACHUSETTS

Containers from inside Building Nos. 1 through 3

WASTE	QUANTITY		DISPOSAL METHOD	HAZARDOUS WASTE CODE		DISPOSAL LOCATION
Sodium Aluminate	6	Drums	neutralization/landfill	D002	corrosive	EQ
Sulfuric Acid	3	Drums	neutralization/landfill	D002	corrosive	EQ
Formic Acid	1	Drum	neutralization	D002	corrosive	Enpro Services of VT
Mercury Devices	1	Drum	metals recovery	D009	mercury	Complete Recycling Solutions
Radioactive Sources	1	Drum	recycling	Rad	radiation	Qual-X

NOTE:

Nos. = numbers
EQ is located in Detriot, Michigan
Enpro Services is located in Williston, Vermont.
Complete Recycling Solutions is located in Fall River, Massachusetts.
Qual-X is located in Powell, Ohio.

Attachment 1

CDs of Site Air Perimeter Sample Results
and Site Photographs

Disc 1 – Site Air Perimeter Sample Results
Photographs of the site, Building Nos. 1 and 2
Disc 2 – Photographs of the boiler room and Building Nos. 3, 4, and 5